

# EXHIBIT 3

## (To Be Filed Under Seal)

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK

3 -----  
4 Claudinne Feliciano, :  
5 :  
6 Plaintiff, :  
7 :  
8 vs. : Case No. 17-cv-5507  
9 :  
10 CoreLogic Rental Property :  
11 Solutions, LLC, :  
12 :  
13 Defendant. :  
14 -----

15 VIDEOTAPED DEPOSITION OF JANET ERNST

16 DATE: December 14, 2018

17 TIME: 9:33 a.m. to 4:16 p.m.

18 LOCATION: Veritext Legal Solutions  
19 1250 I Street, Northwest  
20 Suite 350  
21 Washington, D.C. 20005

22 REPORTED BY: Felicia A. Newland, CSR

1 I assume that's somebody who collecting criminal  
2 data, not somebody who was a criminal?

3 A That's correct.

4 Q Okay.

5 All right. And so you then had three  
6 different areas that you were overseeing, correct,  
7 for field collection?

8 A That's correct.

9 Q And that was from starting in '11?

10 A Yes, to the best of my recollection.

11 Q And you did that until when?

12 A Until 2017.

13 Q Okay. And then what occurred in 2017  
14 that changed your duties?

15 A In mid 2017, we determined that we  
16 would acquire the data from an alternate source  
17 instead of collecting it ourselves.

18 Q And is that all this data, land  
19 records, landlord/tenant and criminal?

20 A It was land records and  
21 landlord/tenant.

22 Q Not criminal?

1           A       No, we -- well, we had an alternate  
2 source for that so...

3           Q       I see.

4                   [REDACTED]

5           [REDACTED]

6           [REDACTED]

7           [REDACTED]

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16          [REDACTED]       [REDACTED]

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19          [REDACTED]

20          [REDACTED]

21          [REDACTED]

22          you didn't do, but what did you do? What was

1 your boss?

2 A I don't recall.

3 Q What was his title when he was your  
4 boss?

5 A He was senior leader data  
6 acquisition.

7 Q Is that the job you have now?

8 A Senior leader data sourcing.

9 Q I see.

10 So is there a position called senior  
11 leader data acquisition now at the company?

12 A I don't know.

13 Q Was that position eliminated when  
14 Lexis took over landlord/tenant records?

15 A I don't know.

16 Q So you don't know if that position  
17 exist anymore?

18 A That's correct.

19 Q And who do you report to now?

20 A Idrees Muhammad.

21 Q How do you spell that?

22 A His first name is I-D-R-E-E-S, last

1 [REDACTED]

2 [REDACTED]

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22 [REDACTED]



1       what they are without looking at the report.

2               Q       Okay.  Is it fair to say that New  
3       York City is probably in the top two or three in  
4       the country --

5               A       I would --

6               Q       -- at the very least?

7               A       I think that's fair to say, yes.

8               Q       If not the top one?

9               A       I would say it's within the top five.

10              Q       And so given that New York City is a  
11       large source of records, it would be an important  
12       place to be current, wouldn't it?

13              A       Yes.

14              [REDACTED]

15       [REDACTED]

16       [REDACTED]

17              [REDACTED]       [REDACTED]

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